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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SAUL B. KATZ, in his individual capacity, and as
trustee of the Katz 2002 Descendants' Trust;
FRED WILPON, in his individual capacity, as
trustee of the Wilpon 2002 Descendants' Trust,
and as co-executor of the Estate Of Leonard
Schreier;

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

TO BE FILED UNDER SEAL

COMPLAINT

Adv. Pro. No. 10-_____ (BRL)

RICHARD WILPON, in his individual capacity,
as trustee of the Fred Wilpon Family Trust, and as
trustee of the Saul B. Katz Family Trust;

MICHAEL KATZ, in his individual capacity, and
as the trustee of the Saul B. Katz Family Trust;

JEFFREY WILPON, in his individual capacity,
and as beneficiary of the Fred Wilpon Family
Trust;

DAVID KATZ, in his individual capacity, as
trustee of the Saul B. Katz Family Trust, and as
beneficiary of the Saul B. Katz Family Trust;

GREGORY KATZ, in his individual capacity, and
as beneficiary of the Katz 2002 Descendants'
Trust;

ARTHUR FRIEDMAN; L. THOMAS
OSTERMAN; MARVIN B. TEPPER;
ESTATE OF LEONARD SCHREIER, JASON
BACHER as co-executor of the Estate of Leonard
Schreier;

METS LIMITED PARTNERSHIP; STERLING
METS LP; STERLING METS ASSOCIATES;
STERLING METS ASSOCIATES II; METS ONE
LLC; METS II LLC; METS PARTNERS, INC.;
C.D.S. CORP.; CONEY ISLAND BASEBALL
HOLDING COMPANY LLC; BROOKLYN
BASEBALL COMPANY LLC; FS COMPANY
LLC; 157 J.E.S. LLC; AIR STERLING LLC;
BAS AIRCRAFT LLC; BON MICK FAMILY
PARTNERS LP; BON-MICK, INC.; CHARLES
15 ASSOCIATES; CHARLES 15 LLC;
CHARLES STERLING LLC; CHARLES
STERLING SUB LLC; COLLEGE PLACE
ENTERPRISES LLC; FFB AVIATION LLC;
IRIS J. KATZ AND SAUL B. KATZ FAMILY
FOUNDATION, INC.; JUDY AND FRED
WILPON FAMILY FOUNDATION, INC.; RED
VALLEY PARTNERS; ROBBINSVILLE PARK
LLC; RUSKIN GARDEN APARTMENTS LLC;
SEE HOLDCO LLC; SEE HOLDINGS I; SEE
HOLDINGS II; STERLING 10 LLC; STERLING
15C LLC; STERLING 20 LLC; STERLING
AMERICAN ADVISORS II LP; STERLING
BRUNSWICK CORPORATION; STERLING
BRUNSWICK SEVEN LLC; STERLING DIST
PROPERTIES LLC; STERLING EQUITIES;
STERLING EQUITIES ASSOCIATES;
STERLING EQUITIES INVESTORS;
STERLING HERITAGE LLC; STERLING

INTERNAL V LLC; STERLING JET LTD;
STERLING JET II LTD; STERLING
PATHOGENESIS COMPANY; STERLING
THIRD ASSOCIATES; STERLING THIRTY
VENTURE LLC; STERLING TRACING LLC;
STERLING TWENTY FIVE LLC; STERLING
VC IV LLC; STERLING VC V LLC; VALLEY
HARBOR ASSOCIATES; SAUL B. KATZ
FAMILY TRUST; FRED WILPON FAMILY
TRUST; KATZ 2002 DESCENDANTS' TRUST;
WILPON 2002 DESCENDANTS' TRUST;
IRIS KATZ, in her individual capacity, and as
trustee of the Saul B. Katz Family Trust;
JUDITH WILPON, in her individual capacity, and
as trustee of the Fred Wilpon Family Trust;
DAYLE KATZ, in her individual capacity, as
trustee of the Katz 2002 Descendants' Trust, and
as beneficiary of the Katz 2002 Descendants'
Trust;
DEBRA WILPON, in her individual capacity, as
trustee of the Fred Wilpon Family Trust, and as
trustee of Wilpon 2002 Descendants' Trust;
VALERIE WILPON; AMY BETH KATZ;
HEATHER KATZ KNOFF, in her individual
capacity, as trustee of the Saul B. Katz Family
Trust, and as beneficiary of the Saul B. Katz
Family Trust;
HOWARD KATZ, in his individual capacity, and
as beneficiary of the Katz 2002 Descendants'
Trust;
NATALIE KATZ O'BRIEN, in her individual
capacity, as trustee of the Saul B. Katz Family
Trust, and as beneficiary of the Saul B. Katz
Family Trust;
TODD KATZ, in his individual capacity, and as
beneficiary of the Katz 2002 Descendants' Trust;
BRUCE N. WILPON, in his individual capacity,
and as beneficiary of the Fred Wilpon Family
Trust;
DANIEL WILPON, in his individual capacity, and
as beneficiary of the Wilpon 2002 Descendants'
Trust;
JESSICA WILPON, in her individual capacity,
and as beneficiary of the Wilpon 2002
Descendants' Trust;
ROBIN WILPON WACHTLER, in her individual
capacity, and as beneficiary of the Fred Wilpon
Family Trust;

PHILIP WACHTLER;
KIMBERLY WACHTLER, in her individual
capacity, and as beneficiary of the Fred Wilpon
Family Trust;
SCOTT WILPON, in his individual capacity, and
as beneficiary of the Wilpon 2002 Descendants'
Trust;
Minor 1 (REDACTED);
Minor 2 (REDACTED);
RUTH FRIEDMAN; PHYLLIS REBELL
OSTERMAN; ELISE C. TEPPER; JACQUELINE
G. TEPPER; EDWARD M. TEPPER;
DEYVA SCHREIER ARTHUR, in her individual
capacity, and as beneficiary of the Estate of
Leonard Schreier;
MICHAEL SCHREIER, in his individual capacity,
and as beneficiary of the Estate of Leonard
Schreier;
REALTY ASSOCIATES MADOFF II;
STERLING ACQUISITIONS LLC; STERLING
AMERICAN PROPERTY III LP; STERLING
AMERICAN PROPERTY IV LP; STERLING
AMERICAN PROPERTY V LP,

Defendants.